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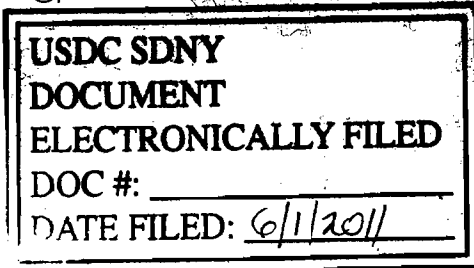
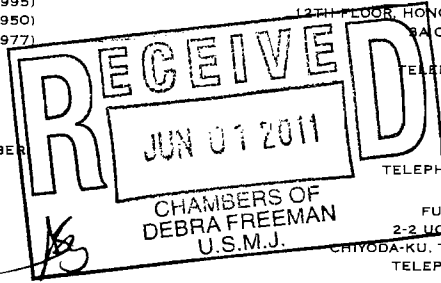
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*NOT ADMITTED TO THE NEW YORK BAR

By Hand

The Honorable Debra Freeman
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

In re American International Group, Inc., 2008 Securities Litigation,
Master File No. 08-CV-4772 (LTS)(DCF)

Dear Judge Freeman:

On behalf of the Underwriter Defendants in the above-captioned matter, I write to request an extension of the deadline for substantial completion of document production, currently scheduled for June 1, 2011 to July 15, 2011. The Underwriter Defendants previously reserved our right to seek an extension of time and respectfully submit our second request for an extension of the production deadline. The Court's most recent scheduling order, Case Management Order No. 2, contemplates that the parties will focus on class certification-related discovery until September 2011, and we do not believe this additional time will interfere with the overall schedule and the other dates set forth in Case Management Order No. 1 and Amended Pretrial Scheduling Order No. 1. Pursuant to Rule 2(B) of Your Honor's Individual Practices, we have consulted with all parties, and none oppose our request.

as the within request for an extension is apparently unopposed, the request is granted. Counsel are directed to continue to confer and to work together in good faith to move discovery forward.

SO ORDERED: DATE: 6/7/11
none produced to
6/1/11
DEBRA FREEMAN
UNITED STATES MAGISTRATE JUDGE

PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP

The Honorable Debra Freeman

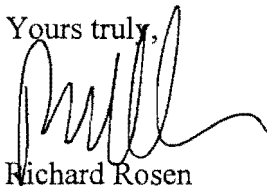
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Since the Underwriter Defendants' first application for an extension, we have diligently continued to gather, review and produce documents responsive to Lead Plaintiff's requests for documents. More than 100,000 pages have been produced to date. We have also continued to meet and confer with counsel for Lead Plaintiff on a weekly basis to discuss the status of document collection and production and to focus our collection efforts on those documents Lead Plaintiff views as most time-sensitive. Accordingly, in our latest productions, we have endeavored to include those categories of documents specifically identified by Lead Plaintiff.

Despite our best efforts, we believe that an extension of time until July 15, 2011 is necessary to allow us to meet our production obligations. As previously indicated, the Underwriter Defendants have had to locate and collect documents from more than thirty clients, each of which has its own corporate structure and unique document retention and retrieval systems and protocols. Although we are now nearing completion of our collection efforts, there is a massive volume of data in queue for processing and review. Counsel for the Underwriter Defendants have substantially increased the size of its staff in order to facilitate this process but will require more time to do so.

For these reasons, we respectfully request that the deadline for substantial completion of document production for the Underwriter Defendants be extended from June 1, 2011 to July 15, 2011. We will continue to make rolling productions and hold weekly meet-and-conferences with Lead Plaintiff about the status of production. We will also make every good-faith effort to meet our production obligations by July 15, 2011, but in view of the large volume of data we are reviewing as well as the complications associated therewith, we must respectfully reserve the right to request an additional extension of time as the proposed deadline approaches. Of course, we will remain in communication on an ongoing basis with Lead Plaintiff's counsel and will confer with them before making any further application to the Court.

Yours truly,

A handwritten signature in black ink, appearing to read 'Richard Rosen', written over the typed name.

Richard Rosen

cc: All counsel (via email)